

PG. 1 OF 6

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

DEBRA P. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA
1:09

ALONZO AUSTIN,)
Plaintiff,)
V.) Case Number:
CITY OF TUSKEGEE et al.,) 3:07-CV-754-MHT
Defendants) via Certified mail

PLAINTIFF RESPONSES TO DEFENDANTS INTERROGATORIES

Comes Now, Plaintiff, and provides required responses
pursuant to Federal Rule of Civil Procedure 33:

1. State the following identifying information:

- your full name; ALONZO AUSTIN
- any other names that you currently use, or
any other names that you have used in the past.
(None)

c. your date and place of birth;

April 3, 1946, Hardaway, ALABAMA.

d. your Social Security Number: XXX-XX-0358

e. your current residence and mailing address:
1321 Oliver-Carlis Rd., Tuskegee, AL 36083

f. the Name of your Spouse.

YVONNE AUSTIN.

a. g. Your educational background:

High School Drop out.

h. The issuing state and number of your Drivers License,
ALABAMA, #4575542

2. For each employer that you have had within the past ten (10) years from the present date, State the following:
(None).

3. If you contend that the incidents made the basis of your Lawsuit caused you to suffer any bodily injury, physical illness, mental illness, or emotional distress, for each doctor, hospital, clinic, therapist, counselor, or care provider that has treated you or examined you for the same, State the following:
(None)

4. Response same as above. (None)

5. State the Name, residence address, and telephone number, and business address and telephone number, of each witness who can testify based on their personal knowledge that the plaintiff was outside the Tuskegee City limits at the time the traffic violation made the basis of this lawsuit occurred.

Officer Bernice Dawson, 205 Rush drive, Tuskegee, AL.
Ph# (334) 727-6323.

b. State the Name, residence address, and telephone Number and business address and telephone Number, of each witness who can testify based on their personal knowledge that the Plaintiff was not exceeding the posted Speed limit within the Tuskegee City limits at the time of, and immediately prior to, the incident made the basis of this Lawsuit.

Officer Bernice Dawson, 205 Rush drive, Tuskegee, AL
Phone # (334) 727-6323, Police Dept., 1106 Notasuga Rd.
Tuskegee, AL. 36083, (334) 727-0200

7. STATE the Name, residence address, and telephone Number, and business address and telephone Number, of ~~each~~ witness who will testify to the ~~Custom~~, policy, or practice of the City of Tuskegee to intentionally, willfully, or knowingly operate an illegal "speed trap" outside the City limits of Tuskegee as alleged in the Complaint.

(to be determined after more factual

Development). (With Officer Dawson Primary).
(and incorporated in paragraphs 5 and 6).

8. List in detail all monetary damages that you claim to be owed to you by these Defendants and your method of computing the same, as a result of the incidents made the basis of this Lawsuit. See, Complaint \$600,000 Compensatory and \$450,000 Punitive
\$120⁰⁰ Total payment, 8/20/07 = \$20 Fine, and \$100 Court Cost.
Source: RK / TUS CARLA, receipt # 0003834.

9. State the name, residence address and telephone number, and business address and telephone Number of each Person having knowledge of the facts, details, or information of the matter complained of in this case.
ALL the named Defendants' whose addresses and Phone Numbers are known to Defendants.

10. State in detail your Version of the traffic stop made the basis of this Lawsuit and all facts that you contend prove your allegations against these Defendants.

See: Plaintiff's Complaint.

11. for each expert that you have consulted, retained or that you intend to have testify at trial
State the following -
(None)

12. State if you have ever been arrested or convicted (found guilty, adjudicated guilty, pled no contest, and / or pled guilty) for any misdemeanor or felony Criminal offense if yes State the following.
Plaintiff Object to this Interrogatory as it is not relevant to any of the allegation of Plaintiff Complaint.

13. State whether you have ever been involved in any lawsuits including collection actions or bankruptcies, in the ten 10 years prior to this date, if yes list all lawsuits filed by, or against you, setting forth.

Plaintiff object to this interrogatory as it is not relevant to any of the Plaintiff allegation.

14. For each traffic citation or arrest you have received within the last ten 10 years, state the following:

Plaintiff object to this interrogatory as it is not relevant to any of the allegation made by Plaintiff within his Complaint.

15. For each of your relatives who are at least 18 years of age and resides in Macon County, ALABAMA, state the following:

Plaintiff object to the interrogatory as it is not relevant to any of Plaintiff allegation within his Complaint and it will not lead to admissible evidence.

I, Alonzo Austin, do declare that I have answered all of Defendants propounded relevant interrogatories, truthfully and to the best of my belief on this 3rd day of January 2008.

Alonzo Austin Pro
by. Alonzo Austin, Pro Se.

ALONZO AUSTIN
1321 Oliver-Carlis Rd,
Tuskegee, Al. 36083
Ph# (334) 727-5476

CERTIFICATE OF SERVICE

I, ALONZO AUSTIN do certify that I have served on this day a copy of the foregoing interrogatories upon the Defendants Counsel or Defendant's

CITY OF TUSKEGEE et al,
c/o NIX HOLTSFORD
GILLILAND HIGGINS + HITSON
ATTORNEY and Counselors at Law
P.O. Box 4128
Montgomery, Al. 36103-4128

by depositing same in the U.S. mail. Postage Prepaid
on this the 3rd day of January 2008

Alonzo Austin Prose
by, Alonzo Austin Prose

ALONZO AUSTIN

1321 Oliver-Carlis Rd,

Tuskegee, Al. 36083

Ph# (334) 727-5476